Meadow Pathways Wellbeing and Education Cornwall (MPWEC)

Privacy Notice

How we collect and use personal information

Responsibility to update: Zoe Waitz and Michelle Pascoe
Applies to: Children and young people (CYP) we support, their parents and carers, schools, local authorities and other professionals who refer to, contact or work with Meadow Pathways, including through our website.

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Section 1 – Who We Are

Meadow Pathways Wellbeing and Education Cornwall Ltd ("Meadow Pathways", "we", "us") provides trauma-informed education and wellbeing support for children and young people across Cornwall, including Education Other Than At School (EOTAS) packages and support commissioned by schools and the local authority.

We are the **data controller** for the personal information described in this notice. This means we decide how and why it is used, and we are responsible for looking after it.

- Registered with the Information Commissioner's Office (ICO): registration number ZC004652
- Registered in England, company number 16430906
- Registered office: 11 Walsingham Place, Truro, England, TR1 2RP
- Data Protection Leads: Michelle Pascoe and Zoe Waitz (contact: Michelle.Pascoe@meadowpathwayscornwall.com)

This notice explains what information we collect, why we collect it, who we share it with, how long we keep it and what your rights are. It should be read alongside our Data Protection Policy and our Safeguarding and Child Protection Policy.

Section 2 – Whose Information We Collect

We collect and use personal information about:

- Children and young people (CYP) who are referred to or supported by Meadow Pathways
- Parents, carers and family members
- Referrers, including school staff, local authority officers and other professionals
- People who contact us through our website, by email or by phone

Section 3 – What Information We Collect

About children and young people

- Name, date of birth, address and current school or setting
- Education information, such as year group, attainment, attendance, exclusions and preferred curriculum
- Special educational needs information, including EHCP status and primary need
- Details of presenting needs, behaviour, interventions already tried and outcomes being sought
- Records of the sessions and support we provide, and progress reports
- Photographs and images, only where written consent has been given

About parents, carers and professionals

- Names, roles, relationship to the young person and contact details
- Records of communication with us
- Consent confirmations given as part of a referral
- Payment and invoicing details, where you are paying for or commissioning a service

Special category information

Some of the information we hold is more sensitive and is given extra protection under UK data protection law. This includes:

- Health information, including medical conditions, diagnoses and medication
- Special educational needs and disability information
- Safeguarding and child protection information
- Information about involvement with services such as CAMHS, speech and language therapy or social care

We only collect this information where it is needed to keep a young person safe and to provide the right support.

Section 4 – How We Collect Information

We collect information:

- Through our referral forms, whether completed on our website, on paper or by email
- From schools, the local authority and other professionals involved with the young person
- Directly from young people, parents and carers, including through our "Getting to Know You" questionnaire and initial meetings
- Through the sessions and support we deliver
- When you contact us through our website, by email or by phone

Section 5 – Why We Use Information and Our Lawful Basis

We must have a lawful reason (a "lawful basis") for every use of personal information. We use information for the following purposes:

- **Assessing referrals and planning support:** to understand a young person's needs and decide whether and how we can help. Lawful basis: performance of a contract with the commissioning school, local authority or family, and our legitimate interests in delivering a safe, suitable service.
- **Delivering education and wellbeing support:** planning sessions, recording progress and reviewing outcomes. Lawful basis: performance of a contract and our legitimate interests.
- **Safeguarding and child protection:** keeping children safe and sharing concerns with the right agencies. Lawful basis: legal obligation, and substantial public interest for the safeguarding of children and individuals at risk.
- **Meeting health, SEN and care needs:** such as individual care plans and risk assessments. Lawful basis: substantial public interest, or explicit consent where we ask for it.
- **Reporting to commissioners:** providing attendance, progress and outcome reports to the school or local authority that commissioned the support. Lawful basis: performance of a contract and legal obligation.

- **Responding to enquiries:** replying to messages sent through our website, by email or by phone. Lawful basis: our legitimate interests in responding to people who contact us.
- **Invoicing and accounts:** Lawful basis: performance of a contract and legal obligation (tax and financial record-keeping).
- **Photographs and publicity:** using images on our website or in materials. Lawful basis: consent, which can be withdrawn at any time.

Where we rely on consent, you can withdraw it at any time by contacting us. This will not affect anything we did before consent was withdrawn.

Section 6 – Who We Share Information With

We only share information when it is necessary, lawful and proportionate. We may share information with:

- The young person's school or setting and the local authority, including Cornwall Council
- Health professionals and services, such as CAMHS, the NHS, speech and language therapy, occupational therapy and educational psychology
- Children's social care, the police and other safeguarding partners where there is a safeguarding concern
- Regulators and inspectors, such as the local authority AP coordinator or Ofsted, where required
- Service providers who help us run Meadow Pathways and who only act on our instructions, including our email and secure file storage provider and our accountant
- Formspree, the service that securely receives forms submitted through our website

In line with Working Together to Safeguard Children 2026, information may be shared without consent where seeking consent would increase the risk of harm to a child, prejudice a criminal investigation or cause undue delay where a child may be at risk.

We never sell personal information, and we do not use it for marketing without your permission.

Section 7 – Our Website and Transfers Outside the UK

Forms completed on our website (referral forms, school referral forms and contact forms) are securely processed by Formspree, a service based in the United States, before being sent to us by email. Formspree stores submissions on our behalf and only uses them to provide this service to us.

Where personal information is transferred outside the UK, we make sure it is protected by the safeguards required by UK data protection law, such as the UK–US Data Bridge or approved contract clauses set out in our supplier's data processing agreement.

Our website does not use cookies, analytics or tracking tools, and we do not use your information for advertising. Like most websites, our hosting provider may keep basic technical records, such as IP addresses, to keep the site secure.

Section 8 – How We Keep Information Secure

- Access to personal information is restricted to authorised staff who need it for their role
- Electronic records are kept on password-protected systems with two-factor authentication
- Paper records are stored securely and locked away when not in use
- Information is transferred securely, and files are passed on safely when a young person moves to a new provision
- All staff complete data protection training at induction and every year
- Any suspected data breach is reported immediately to our Data Protection Leads and, where required, to the ICO within 72 hours

Section 9 – How Long We Keep Information

We keep information only for as long as we need it, in line with Keeping Children Safe in Education (KCSIE) 2026 and recognised records management guidance for education settings. Our retention periods are:

- Referrals for young people we go on to support: kept as part of the young person's record, until their 25th birthday
- Records of children and young people we have supported: until the young person's 25th birthday
- Safeguarding and child protection records: until the young person's 25th birthday. Records relating to allegations of child sexual abuse are kept for 75 years, as recommended by the Independent Inquiry into Child Sexual Abuse. Any record kept longer than usual is clearly marked with the reason.
- Referrals that do not lead to support: 12 months from the date of the referral, unless they contain a safeguarding concern, in which case that information is kept as a safeguarding record
- General enquiries and messages: 2 years
- Financial and invoicing records: 6 years from the end of the financial year, as required for tax purposes
- Photographs: until consent is withdrawn or they are no longer needed
- Website form submissions held by Formspree: deleted from Formspree once saved to our secure records, and within 30 days

When a young person moves to a new school or setting, our Designated Safeguarding Lead makes sure their child protection file is transferred securely, and separately from their main record, as soon as possible. As KCSIE 2026 requires, this is within 5 days for an in-year move or within the first 5 days of the start of a new term.

When information is no longer needed, it is securely deleted or shredded.

Section 10 – Your Rights

Under UK data protection law, you have the right to:

- Be told how your information is used, as set out in this notice

- Access the personal information we hold about you
- Ask us to correct information that is wrong or incomplete
- Ask us to delete information, where the law allows
- Ask us to restrict how we use your information
- Object to how we use your information
- Ask for your information to be transferred to another organisation, where this applies
- Withdraw consent at any time, where we rely on consent

Children and young people can exercise their own rights where they are mature enough to understand them. Parents and carers can usually make requests on behalf of younger children.

To make a request, contact one of our Data Protection Leads. There is usually no charge, and we will respond within one month. Some rights are limited where information is held for safeguarding or legal reasons, and we will explain if this applies.

We do not make decisions about anyone using automated processes or profiling.

Section 11 – Complaints

If you have a concern about how we use your information, please contact us first so we can try to put it right.

You also have the right to complain to the Information Commissioner's Office (ICO):

- Website: ico.org.uk/make-a-complaint
- Helpline: 0303 123 1113

Section 12 – Changes to This Notice

We review this notice every year, or sooner if the law or the way we use information changes. The latest version is always available on our website and on request.

Section 13 – Contact

For questions about this notice or to make a request about your information, contact our Data Protection Leads:

- Michelle Pascoe – Michelle.Pascoe@meadowpathwayscornwall.com – 07563 862530
- Zoe Waitz – Zoe.Waitz@meadowpathwayscornwall.com – 07563 855070